

OCT 3 - 2000

Joseph Douglass, Director
Regulatory Affairs
Ames Rubber Corporation
Rte. 94
Hamburg, NJ 07419

Re: Ames Rubber Corporation (Hamburg, NJ) Compliance Evaluation Inspection
EPA ID No.: NJD 002 389 468
Ames Rubber Corporation (Wantage, NJ) Non-Financial Record Review
EPA ID No.: NJD 000 818 518

Dear Mr. Douglass:

On August 17, 2000, a representative of the U.S. Environmental Protection Agency (EPA) conducted an inspection and record review, as noted, at the above-referenced facilities. At that time, those facilities were found to be in compliance with pertinent provisions of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. § 6901, 6928.

Please understand you have a continuing obligation to comply with all applicable state and federal regulations regarding the management of hazardous waste. If you have any questions, please contact Mr. Thomas Prol, of my office, at (212) 637-4157.

Sincerely,

Joel Golumbek, Section Chief
Hazardous Waste Compliance Section
Division of Enforcement and Compliance Assistance

cc: Wolfgang Skacel, Chief
Bureau of Hazardous Waste Compliance and Enforcement
Central Field Office
New Jersey Department of Environmental Protection

bcc: Tom Prol DECA/RCB
RCRA file Room

minor revisions
after checking
my notes...

RCRA INSPECTION REPORT

Ames Rubber Corporation

Rte. 94

Hamburg, NJ 07419

Rte. 565

Wantage, NJ 07461

NJD 002 389 468

NJD 000 818 518

Facility Contact: Joseph Douglas, Director of Regulatory Affairs 973/827-9101

EPA Inspector: Tom Prol, DECA/RCB/HWCS (212) 637-4157

Introduction

A RCRA CEI was performed at the above-noted facility on August 17, 2000, with entry made at 1:50 p.m. The facility is a LQG for one month per year, and a SQG all other months, and does not dispute its status as a fully-regulated LQG. It was in compliance with LQG regulations at the time of the inspection.

In addition, a sister Ames Rubber facility in Wantage is a SQG, and the inspector performed a non-financial records review for that facility as the Hamburg headquarters maintains all manifest records for that facility. Both inspections were entered in RCRIS, and the Hamburg inspection was entered in the ICDS database as well. Another sister facility in Vernon appeared to be a SQG, based on manifest documentation.

Background

The facility manufactures rubber-coated rollers and "elastomerically coated metal products" for typewriters, printers and copiers. The facility operation is simple and involves import of ready-made aluminum cylinders from the facility's Vernon, NJ, plant. These rollers are sand blasted on-site prior to cleaning with an aqueous degreaser and detergent bath, and then the affixing of an adhesive coating by precision spraying. The spent sand is tested and found to be non-hazardous, and is sold for 3 cents per pound to a recycler. The facility also uses acid baths in the manufacture of its rubber coatings, and the annual single episode disposal of this spent acid waste results in the facility being a LQG each year for a single month.

Facility Tour

The inspector discussed the facility operations, as noted above, and requested a tour of the facility. As they walked, the representative discussed the facility's manufacturing processes, and noted that there is an on-site monitoring wells and groundwater treatment unit for chlorinated solvent contamination related to the company's activities years ago. The representative also noted that this inspection was occurring the day after a record 100-year flood had swept through the facility, causing the facility to implement its contingency plan—successfully—according to the facility representative.

Ames Rubber Corporation

page two

The representative described the facility's response to the rain storm that brought water nearly into the single-building manufacturing and office structure, and that washed through the outside 90-day hazardous waste storage shed. Though the rising water had left some silt in the shed, the storage shed area did not appear disturbed otherwise and the inspector noted that the small amount of waste on-site was kept off the ground and did not spill or leak from the containers. The inspector observed a single drum of D002 waste dated 06/31/00, and eight drums of "corrosive" waste, dated 07/17/00. There were no noncompliance issues observed, and the inspector inquired about the facility's waste handling procedures in this area, which seemed satisfactory.

The representative continued discussing operations and products, as well as the manner in which hazardous wastes are generated. He stated that there are four categories of hazardous waste at the facility, all related to the facility's precision spraying or painting of rollers:

1. Coatings (adhesives) that are solvent bearing;
2. Fluorescent bulbs (D009) sent to Radiac Research Corp.;
3. Acid baths;
4. Paint waste.

As the inspector and the facility representative entered the rear of the facility, the inspector observed a "satellite accumulation area" which was contained in an explosion proof, "flammable room." Since this was outside of the facility, the inspector asked where the point of generation is. The representative then took the inspector indoors and through another room in the facility where he pointed out a paint booth in which rollers are painted.

The inspector observed that this point of generation was not "at or near" the point of generation and told the representative that this was a different set-up than what those regulations permit. The representative stated that the paint booth operator mixes paints back in that flammable room, brings the paint mixture inside the facility, paints and then removes waste out of the facility to the flammable room once per day. He stated that, even though this was not at or near the point of generation, it was the safest procedure that the facility could use. The room where mixing is done, and where waste and other paint-related mixing materials, thinners, etc., are maintained, is specifically designed to prevent explosive incidents. In fact, all drums in the room are grounded and the representative noted that when a paint waste drum is filled, it is taken back to the 90-day storage area for disposal pick-up.

During the tour, the inspector observed that the facility was reasonably maintained and clean. The representative and the inspector returned to the office area for a record review of the Contingency Plan, training records, inspection logs and manifests. All of these appeared in order, and relevant copies of documents are appended to this report. The facility meets preparedness and prevention requirements, and the Contingency Plan was properly distributed to local emergency response personnel and hospitals, as demonstrated by certified mail receipts.

EMERGENCY CONTACTS

April 6, 2000

Ames Rubber Corporation
Plant 1 - Hamburg, N.J.
(973) 827-9101

Outside Contacts

911 Dispatches All Public Responders

Onyx Environmental - Emergency Cleanup Contractor	(973) 347-7111
Ferrell Gas Co (24 Hour Emergency Service)	(973) 827-7135
GPU Energy	(800) 452-9155
Sussex County MUA (water treatment plant)	(973) 827-8880
Chemtrec	(800) 424-9300
NJ Department of Environmental Protection	(609) 292-7172
National Response Center	(800) 424-8802
S.E.M. Security Systems Inc.	(973) 764-0336

Ames Rubber Corporation Contacts

		<u>Home Phone</u>	<u>Home Address</u>
<u>Emergency Coordinators</u>			
Robert Einreinhofer	Emergency Coordinator V.P. Operations	729-8714	1 Cheyenne Trail Sparta, NJ 07871
Joe Douglass	Assistant Coordinator Environmental Director	827-0107	22 Krogh's Lane Sparta, NJ 07871
Jim Stipo	Assistant Coordinator Div. General Mgr.	875-9705	127 Nielson Rd. Sussex, NJ 07461

Emergency Spill Contacts - Nights and Weekends

For indoor spills of flammable liquids, shut-down power and evacuate area. For all other hazardous spills, evacuate the area. Then, call Ames spill contacts in the following order:

- | | | |
|----|-----------------|----------------|
| 1. | Butch Thomas | (973) 827-3013 |
| 2. | Neil McCain | (973) 827-9148 |
| 3. | Sam VanderWiele | (973) 875-5713 |
| 4. | Gary Solecki | (973) 347-2289 |

On day shifts, page Spill Team Members from attached Roster

EMERGENCY CONTACTS

April 6, 2000

Ames Rubber Corporation
Plant 1 - Hamburg, N.J.
(973) 827-9101

Management

Tim Marvil	C.O.O.	(973) 702-8987
Chris DelRosario	Technical Director	(973) 767-7411
Jim Stipo	Div. General Manager	(973) 875-9705
Dan Crowell	Production Foreman	(973) 875-8429
Joe Cooper	Production Foreman	(973) 875-3060

Fire Squad

Jim Dale	Chief	(973) 948-3088
Minard Houghtaling	Asst. Chief	(973) 827-8631

First Aid Squad

Pam Crum		(973) 875-9323
Gary Kays		(973) 827-4116

Regulatory Affairs

Gary Solecki	Health & Safety Manager	(973) 347-2289
Sam VanderWiele	Environmental Technician	(973) 875-5713

Technical Department

Frank Plaza	Analytical Services Manager	(973) 827-3105
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Engineering

Harold Peck	Plant Engineering Manager	(973) 875-3164
	pager (800) 225-0256 Account # 030-5653	
Joe Lulek	Team Leader	(973) 948-7543
	pager (800)225-0256 Account # 74792	

Maintenance

Deal Rude	Supervisor	(973) 827-7967
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Site Management

Butch Thomas	Site Manager	(973) 827-3013
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Personnel

Karen Hartman	H.R. Director	(973) 728-9449
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IV. Ames Hazardous Waste Management Personnel

(August 2000)

Regulatory Affairs

Joe Douglass Director

Operations

Sam VanderWiele	Corporate Hazardous Waste Coordinator - Operations
Sam VanderWiele	Plant 1 Hazardous Waste Coordinator
Sam VanderWiele	Plant 2,3 Hazardous Waste Coordinator
Gerry Rizzo	Plant 4 Hazardous Waste Coordinator

Approved Hazardous Waste Handlers

Plant 1

S. VanderWiele

G. Kays

D. McDole

J. Dale

H. Sanders

R. Carew

N. McCain

J. Cooper

R. Labance

R. Gouger

F. Plaza

P. Tighe

R. Keslo

A. Alazraki

H. Courtright

D. Kollbocker

K. Killion

R.B. Williams

W. Clark

P. Skellenger

D. Rude

R. Snyder

R. Burge

Plant 3

S. VanderWiele

E. Winters

D. Conner

D. Pegg

J. Schurich

R. Compton

J. Southard

E. Carr

Plant 1 cont.

J. Holczer

M. Towle

F. Malzone

Plant 4

G. Rizzo

G. Van Horn

T. Thiessen

F. Babcock

 Enforcement sensitive information. Official use only. Shred/burn to dispose.

ames hburg

* * * COMPLIANCE MONITORING AND ENFORCEMENT REPORT * * *

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Handler Name / ID / Address          S O N P V    Regulated Activities
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AMES RUBBER CORP HAMBURG PLT        N P          LG
  NJD002389468 RTE 94, HAMBURG
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- - - EVALUATIONS - - - - - Areas Evaluated
Type Date Seq Staff Description (Violations Found)
CEI 02/25/00 S N MK COMPLIANCE EVALUATION INS GER GLB
CEI 01/25/99 S N MK COMPLIANCE EVALUATION INS GER GLB
CEI 12/16/96 S N RJ COMPLIANCE EVALUATION INS GER GLB
NRR 10/20/94 S N AA NON-FINANCIAL RECORD REVI GMR(0003S)
CDI 09/29/94 S N AA CASE DEVELOPMENT INSPECTI GMR(0003S)
CEI 06/08/94 S N AA COMPLIANCE EVALUATION INS GER GLB
CEI 12/22/92 E HWEBG COMPLIANCE EVALUATION INS GER
CSE 09/04/92 S NJDEP COMPLIANCE SCHEDULE EVALU CAS
NRR 06/03/92 S NJDEP NON-FINANCIAL RECORD REVI CAS GER(0001S)
CEI 06/02/92 S NJDEP COMPLIANCE EVALUATION INS GER
CEI 04/30/92 S NJDEP COMPLIANCE EVALUATION INS GER(0001S) GER(0002S)

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- - - VIOLATIONS - - - - - Compliance - Latest Enforcement
Area Date Seq Staff Class Scheduled Actual Type Date Num
GMR 09/29/94 0003S N AA 1 10/14/94 10/20/94 120 09/29/94 S
GER 04/30/92 0001S NJDEP 1 05/20/92 06/03/92 120 04/30/92 S
GER 04/30/92 0002S NJDEP 2 05/20/92 06/03/92 120 04/30/92 S
- - ENFORCEMENT - - - - - Violations Addressed
Type Date Seq Staff Attorney Enforcement Number Type(Sequence #)
120 09/29/94 S N AA WRITTEN INFORMAL GMR(0003S)
120 04/30/92 S NJDEP WRITTEN INFORMAL GER(0001S) GER(0002S)

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* * * * * E N D O F R E P O R T * * * * *

 Enforcement sensitive information. Official use only. Shred/burn to dispose.

ames

* * * COMPLIANCE MONITORING AND ENFORCEMENT REPORT * * *

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Handler Name / ID / Address          S O N P V    Regulated Activities
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AMES RUBBER CORP WANTAGE PLT        N P          LG
  NJD000818518  RTE 565, WANTAGE
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- - - EVALUATIONS - - - - -
Type Date Seq Staff Description Areas Evaluated
(Violations Found)
CEI 02/25/00 S N MK COMPLIANCE EVALUATION INS GER GLB
CEI 09/10/98 E RCSK COMPLIANCE EVALUATION INS GER
CSE 09/21/96 S N BF COMPLIANCE SCHEDULE EVALU GER(0007S)
NRR 09/20/96 S N BF NON-FINANCIAL RECORD REVI GER(0007S)
CEI 09/19/96 S N BF COMPLIANCE EVALUATION INS GER(0007S) GLB
NRR 09/12/94 S N BF NON-FINANCIAL RECORD REVI GER(0005S) GMR(0006S)
CEI 08/31/94 S N BF COMPLIANCE EVALUATION INS GER(0005S) GLB
NRR 06/03/92 S NJDEP NON-FINANCIAL RECORD REVI CAS GER(0003S)
CEI 04/28/92 S NJDEP COMPLIANCE EVALUATION INS GER(0003S) GER(0004S)
NRR 02/26/85 004 S NON-FINANCIAL RECORD REVI GER
NRR 01/20/84 003 S NON-FINANCIAL RECORD REVI GER
NRR 02/03/83 001 S NON-FINANCIAL RECORD REVI GER(0001S)

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- - - VIOLATIONS - - - - - Compliance - Latest Enforcement
Area Date Seq Staff Class Scheduled Actual Type Date Num
GER 09/19/96 0007S N BF 1 10/04/96 09/20/96 120 09/19/96 S
GER 08/31/94 0005S N BF 1 09/16/94 09/12/94 120 09/01/94 S
GMR 08/31/94 0006S N BF 1 09/16/94 09/12/94 120 09/01/94 S
GER 04/28/92 0003S NJDEP 1 05/19/92 06/03/92 120 04/28/92 S
GER 04/28/92 0004S NJDEP 2 05/19/92 06/03/92 120 04/28/92 S
GMR 04/28/92 0002S NJDEP 2 05/19/92 06/03/92 120 04/28/92 S
GER 02/03/83 0001S 2 09/09/83 09/23/90 120 08/09/83 001S

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- - ENFORCEMENT - - - - - Violations Addressed
Type Date Seq Staff Attorney Enforcement Number Type(Sequence #)
120 09/19/96 S N FA WRITTEN INFORMAL GER(0007S)
120 09/01/94 S N BF WRITTEN INFORMAL GER(0005S) GMR(0006S)
120 04/28/92 S NJDEP WRITTEN INFORMAL GMR(0002S) GER(0003S)
120 08/09/83 001 S WRITTEN INFORMAL GER(0001S)

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* * * * * E N D O F R E P O R T * * * * *

Joseph R. Douglass
Director of Regulatory Affairs

Ames Rubber Corporation

Ames Boulevard
Hamburg, New Jersey 07419

Tel: 201 827-9101
Fax: 201 827-8893

975

x 282



*Excellence
Through Total Quality*

INSPECTOR'S MULTI-MEDIA CHECKLIST

Facility: **Ames Rubber Corporation**
Rte. 94
Hamburg, NJ 07419

NJD 002 389 468

Contacts: Joseph Douglas, Director of Regulatory Affairs
973/827-9101

Inspector: Tom Prol, DECA/RCB/HWCS (212) 637-4157

Date of Inspection: August 17, 2000

Air

- With the sun in a 140° arc BEHIND you, is opaque smoke is being emitted? NO
- Have any processes been added or changed in any way in the last 2 years? NO
- Has the facility undergone any renovation or demolition during the last 18 months, involving removal or disturbance of asbestos-containing materials? NO
- Do facility employees maintain, service, repair, or dispose of air conditioning/refrigeration equipment involving CFC refrigerant? NO

Emergency Planning and Community Right-to-know Act (EPCRA)

EPCRA Hotline Information: 800-535-0202

Toxic Release Inventory (TRI)

For manufacturing facilities, ask 1-2:

1. Does the facility have 10 or more full-time employees? YES
2. Is the facility classified under SIC codes 20-39? YES (3061)

If the answers to **both** Questions 1. and 2. are **YES**, ask :

3a. Did the facility use >10,000 lb. of a chemical during any of the past 5 calendar years? NO

3b. NA

4. NA (If the answer to Q1 is YES, but the answer to Q2 is NO, continue with Q4.)

5. Did the facility use >10,000 lb. of a chemical during 1998 or later calendar years? NO

“Use” includes treatment, stabilization or disposal of a waste received from off-site for waste processing.

All Other EPCRA:

- Is there on-site any of the 360 "Extremely Hazardous Substances" in excess of established threshold planning quantities (which vary by chemical, and range from 1 to 5000 lb.)? NO
- Has the facility had a release of an Extremely Hazardous Substance or a CERCLA hazardous substance in excess of the Superfund reportable quantity (assume 1 lb.)? NO
- Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals used, as required under OSHA's Hazard Communication Standard? YES

Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

(If you answer NO to the 1st question in any of the following 4 sections, skip that section & go to the next section.)

1. If inspecting a manufacturing facility, ask:

A. Are any pesticides manufactured, relabeled, or repackaged at this establishment? NO

2. If inspecting a storage-distribution facility or a retail facility, ask:

A. Are any pesticides being held for sale/distribution, or stored at this facility (warehouse)? NO

3. If pesticides may not have been properly used, observe and record any effects such as human adverse reaction(s), dead fish, birds, or wildlife, plant damage, etc, and ask:

A. Have pesticides been applied by an employee or by a pesticide application company? NO

NPDES, Pretreatment & UIC

1. Does the facility generate industrial wastes/wastewater (IW), sanitary wastewater (WW) and/or storm water (SW) and dispose of any of it as follows (**Circle as applicable**):

a. To a receiving stream/surface water body (or onto ground near enough to impact one)?.....
IW WW SW

b. To a sanitary sewer system that discharges to a municipal treatment plant (POTW)?.....
IW WW SW

c. To a storm water sewer system?.....
IW* WW* SW

d. To a subsurface disposal system (septic system, drywell, cesspool, sinkhole)?.....
IW* WW SW

e. Is any of it trucked off site?.....
IW WW SW

f. Onto ground surface (e.g. spray, discharge pipe, open trench)
IW WW SW

Identify the water bodies and/or sewer system: Walkill River, Sussex Cty.
Municipal Util. Authority (SCMVA)

2a. Are there floor drains, sinks (not in bathrooms), or storm water collection structures:
- where raw materials, products, wastes or wastewaters are generated, stored or transported &/or
- that are possibly receiving wastes due to poor housekeeping, etc.? NO

3a. Has the facility applied for a permit for each discharge noted in questions 1 and 2? YES NO*
N/A

b. If you answered yes to question 1a or 1c for storm water, but the facility does not have a storm water discharge permit, ask why (facility may not be subject to stormwater requirements):

parking lot runoff

- c. If you answered question 3b, ask what SIC code(s) describe all the facility's activities¹:
-

4 a. Does the facility treat wastewater before discharge? NO

Public Water Supply

1. **Observe/Ask:** Does the facility have its own potable water supply? NO

Radiation

1. Are radioactive materials used or stored at this facility? NO

Resource Conservation & Recovery Act (RCRA)

This section not completed. A full RCRA inspection was done.

Spill Prevention, Control & Countermeasure (SPCC)

1.A. Does the facility store oil, whether petroleum, vegetable or transformer oil? NO

2. NA

3. Did the facility have an oil spill within the last 12 months? NO

Facility Response Plan (FRP)

1. Does the facility have an above-ground oil storage capacity $\geq 42,000$ gallons and conduct operations that include over-water transfers of oil to or from vessels? NO

2. Does the facility have oil storage capacity \geq one million gallons? NO

3. Did the facility submit a Facility Response Plan to the EPA? NO

¹ If the first 2 digits of any facility SIC code are 10-14, 20-45 or 51, or if facility is a landfill/land application site, recycler, hazardous waste TSD, or steam electric power generator, or if there are construction activities covering >5 acres, refer this to the water program (WCB, if the site is in NY or NJ; CEPD's ESB, if in PR or VI).

Toxic Substances Control Act (TSCA)

Polychlorinated Biphenyls (PCBs)

1. Is there liquid-filled electrical equipment (transformers, capacitors) manufactured before 1980? NO
2. Are there hydraulic systems manufactured before 1980 that use/used high temperature fluid? NO
3. Does the facility have any oil-filled heat transfer systems manufactured before 1980? NO
4. Does the facility have PCB waste stored for disposal? NO

General Chemical Regulations: Does the facility manufacture, or import into the United States, any chemicals for which they are the sole manufacturer/importer? NO

Underground Storage Tanks (USTs)

No USTs on-site.

Wetlands

1. A. Are wet areas (marshes, swamps, bogs) on or adjacent to the site? (A federal wetland need not have standing water or wetland-type vegetation; some wetlands have shrubs and trees.) NO

B. Are there any waterbodies or waterways on or adjacent to the site? NO

Rest of question are NA.

CRIMINAL ACTS

During the course of this inspection, has anything been brought to your attention indicating:

1. That the facility is involved in deliberate acts of dumping or discharging wastes NO
2. Bad intent or conduct? e.g., falsification of records or efforts to conceal activities? NO
3. Actual harm to individuals as a result of violations? NO
4. Other activity or behavior that you believe indicates criminal behavior? NO

*** Refer to Criminal Investigation Division, if you checked YES.**

 Enforcement sensitive information. Official use only. Shred/burn to dispose.

ames hamburg

* * * COMPLIANCE MONITORING AND ENFORCEMENT REPORT * * *

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Handler Name / ID / Address          S O N P V   Regulated Activities
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AMES RUBBER CORP HAMBURG PLT        N P         LG
  NJD002389468   RTE 94, HAMBURG
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- - - EVALUATIONS - - - - - Areas Evaluated
Type Date Seq Staff Description (Violations Found)
CEI 02/25/00 S N MK COMPLIANCE EVALUATION INS GER GLB
CEI 01/25/99 S N MK COMPLIANCE EVALUATION INS GER GLB
CEI 12/16/96 S N RJ COMPLIANCE EVALUATION INS GER GLB
NRR 10/20/94 S N AA NON-FINANCIAL RECORD REVI GMR(0003S)
CDI 09/29/94 S N AA CASE DEVELOPMENT INSPECTI GMR(0003S)
CEI 06/08/94 S N AA COMPLIANCE EVALUATION INS GER GLB
CEI 12/22/92 E HWEBG COMPLIANCE EVALUATION INS GER
CSE 09/04/92 S NJDEP COMPLIANCE SCHEDULE EVALU CAS
NRR 06/03/92 S NJDEP NON-FINANCIAL RECORD REVI CAS GER(0001S)
CEI 06/02/92 S NJDEP COMPLIANCE EVALUATION INS GER
CEI 04/30/92 S NJDEP COMPLIANCE EVALUATION INS GER(0001S) GER(0002S)
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- - - VIOLATIONS - - - - - Compliance - Latest Enforcement
Area Date Seq Staff Class Scheduled Actual Type Date Num
GMR 09/29/94 0003S N AA 1 10/14/94 10/20/94 120 09/29/94 S
GER 04/30/92 0001S NJDEP 1 05/20/92 06/03/92 120 04/30/92 S
GER 04/30/92 0002S NJDEP 2 05/20/92 06/03/92 120 04/30/92 S
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- - ENFORCEMENT - - - - - Violations Addressed
Type Date Seq Staff Attorney Enforcement Number Type(Sequence #)
120 09/29/94 S N AA WRITTEN INFORMAL GMR(0003S)
120 04/30/92 S NJDEP WRITTEN INFORMAL GER(0001S) GER(0002S)
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* * * * * E N D O F R E P O R T * * * * *

U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
 Consolidated Permits Program
 (Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

NJ D002389468

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS
 I. EPA I.D. NUMBER
 III. FACILITY NAME
 V. FACILITY MAILING ADDRESS
 VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP AMES RUBBER CORP. HAMBURG PLANT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)
 2 RICHARD J MAJOS MGR. REG. AFFAIR
 B. PHONE (area code & no.)
 201 827 9101

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX
 3 23-47 AMES BLVD.
 B. CITY OR TOWN
 4 HAMBURG
 C. STATE
 NJ
 D. ZIP CODE
 07419

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER
 5 RT 94
 B. COUNTY NAME
 6 SUSSEX
 C. CITY OR TOWN
 HAMBURG
 D. STATE
 NJ
 E. ZIP CODE
 07419
 F. COUNTY CODE (if known)

VIII. OPERATOR INFORMATION

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)			
F = FEDERAL		M = PUBLIC (other than federal or state)		P (specify)	C		201	827	9101				
S = STATE		O = OTHER (specify)			A								
P = PRIVATE													

F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
HAMBURG										NJ		07419		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
15 16										40		41 42		47 51	

XI. MAP



Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. *F9: A/50*

XII. NATURE OF BUSINESS (provide a brief description)

Ames Rubber Corporation is primarily a custom producer of elastomerically coated metal products such as typewriter platens and paper- or film-feeding roller mechanisms. In addition to the production of other smaller elastomerically coated metal parts, our manufacturing facilities routinely mold elastomeric products used in the paper goods industry, the automotive industry, and many others. Some of the types of elastomeric compounds used and produced for our customer applications include natural rubber, SBR, nitrile types, silicone, butyl, polyurethane and others.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print) ARNOLD E. WRIGHT / VICE PRES. MANUFACTURING	B. SIGNATURE 	C. DATE SIGNED 
---	---	--

COMMENTS FOR OFFICIAL USE ONLY	
C	
15	16

FORM 3 RCRA	ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program <i>(This information is required under Section 3005 of RCRA.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px; display: inline-block;"> NJD0002389468 </div>
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FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date) <input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">C</td> <td style="width: 10%;">YR.</td> <td style="width: 10%;">MO.</td> <td style="width: 10%;">DAY</td> </tr> <tr> <td>8</td> <td>49</td> <td>01</td> <td>01</td> </tr> </table> </div> <div style="width: 50%;"> FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left) </div> </div>		C	YR.	MO.	DAY	8	49	01	01
C	YR.	MO.	DAY						
8	49	01	01						

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<div style="display: flex; justify-content: space-between;"> DUP T/A C </div>									
LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY		
		1. AMOUNT (specify)				1. AMOUNT			
		2. UNIT OF MEASURE (enter code)				2. UNIT OF MEASURE (enter code)			
X-1	S 0 2	600	G	5					
X-2	T 0 3	20	E	6					
1	S01	5500 000	G	7					
2	S02	1275 000	G	8					
3				9					
4				10					

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS.....P
TONS.....T

METRIC UNIT OF MEASURE CODE
KILOGRAMS.....K
METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY											
W MJD002389468 T/A C 3 1													W DUP T/A C 3 2 DUP											
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																								
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																				
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))												
1	F001	66.000000	P	501																				
2	F002			501																				
3																								
4	F003	150.000	P	501																				
5	U002																							
6	U239																							
7																								
8	F005	6655.000	P	501																				
9	U154																							
10	U159																							
11	U161																							
12	U220																							
13																								
14	U107	2750.000	P	501																				
15																								
16																								
17																								
18																								
19																								
20																								
21																								
22																								
23																								
24																								
25																								
26																								

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F NJD002389468 36

F6: $\frac{A}{55}$ F6: $\frac{A}{56}$

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

41 10 000

LONGITUDE (degrees, minutes, & seconds)

074 35 000

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

J.D. MARVEL
EXECUTIVE VICE PRESIDENT

B. SIGNATURE

J.D. Marvel

C. DATE SIGNED

2/9/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

ARNOLD E. WRIGHT / VICE PRES.
MANUFACTURING

B. SIGNATURE

Arnold E. Wright

C. DATE SIGNED

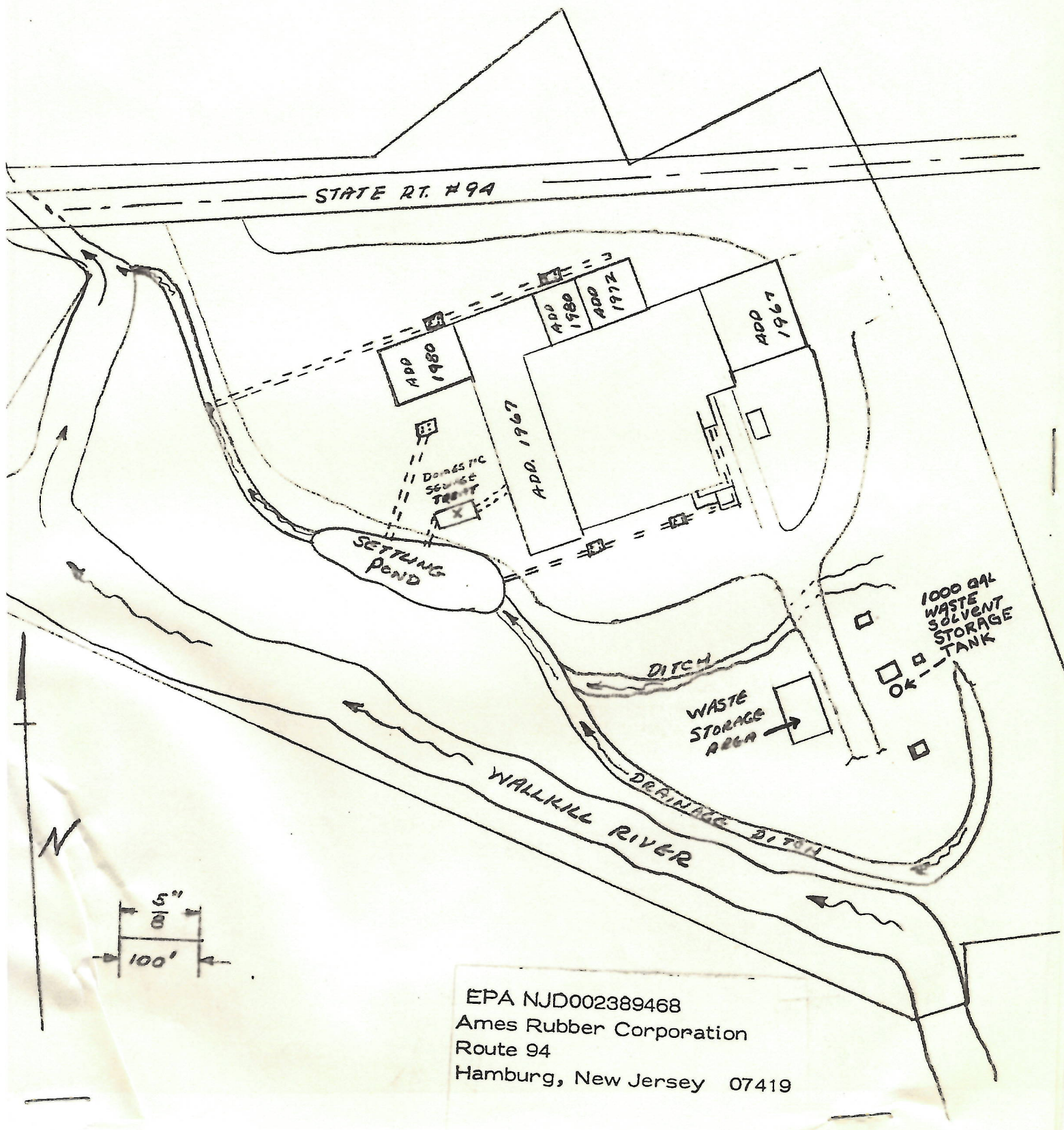
11/19/80

NJ D002389468 AMES RUBBER



EPA NJD002389468
Ames Rubber Corporation
Route 94
Hamburg, New Jersey 07419

NJ D002389468 AMES RUBBER



EPA NJD002389468
Ames Rubber Corporation
Route 94
Hamburg, New Jersey 07419



#14

11/19/80

HAMBURG FACILITY
PRESENT HAZARDOUS
WASTE DRUM STORAGE
AREA.

#8

11/19/80

HAMBURG FACILITY
BACK PARKING LOT
AND ADJACENT AREAS

#15

11/19/80

HAMBURG FACILITY
PROPOSED HAZARDOUS
WASTE DRUM STORAGE
AREA.

#13

11/19/80

HAMBURG FACILITY
PRESENT HAZARDOUS
WASTE DRUM STORAGE
AREA.

FOR OFFICIAL USE ONLY														
5	W	N	J	D	0	0	2	3	8	9	4	6	8	2
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001	2 F002	3 F003	4 F005	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U002	32 U080	33 U107	34 U112	35 U116	36 U154
37 U158	38 U159	39 U161	40 U220	41 U226	42 U238
43 U239	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Richard K. Major
Director of Regulatory Affairs
8/18/80



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

TJ0002389468

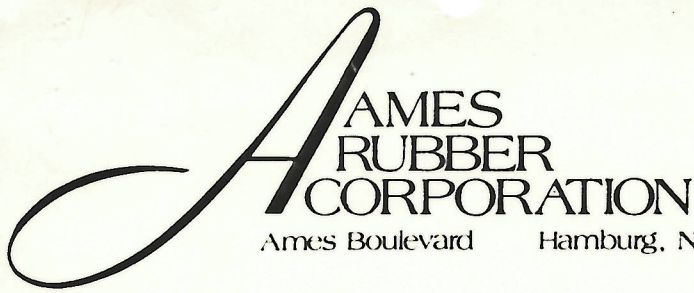
AMES RUBBER CORPORATION
ROUTE 94
HAMBURG

NJ 07419

INSTALLATION ADDRESS

ROUTE 94
HAMBURG

NJ 07419



Ames Boulevard

Hamburg, New Jersey 07419

201 827-9101

TWX 710-988-3241

September 9, 1983

Mr. Joseph Czinar
Grants Administration Branch
Room 937-A
U. S. EPA Region II
26 Federal Plaza
New York, New York 10278

Subject: 40 CFR 265.147 Compliance - Hazardous Waste Facility
Certificate of Liability Insurance.

Reference: NJD 002389468, NJD 000818518.

Dear Mr. Czinar:

Enclosed you will find a corrected copy of the Hazardous Waste Facility Certificate of Liability Insurance for our two facilities (NJD 002389468, NJD 000818518). The Limits of Liability has been corrected to show \$1 million per occurrence for bodily injury; \$100,000 for property damage; and an umbrella policy for \$3 million for bodily injury and property damage combined to satisfy the \$2 million annual aggregate, exclusive of legal defense costs.

We are currently still working on the closure trust fund to satisfy 40 CFR 265.143. We hope to have a copy available for your scrutiny soon.

We appreciate your department's help and guidance and if I can be of further assistance, please call upon me.

Very truly yours,

AMES RUBBER CORP.

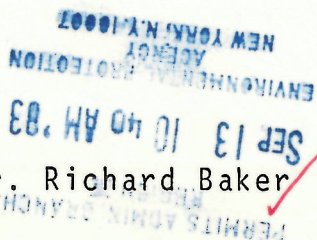
A handwritten signature in dark ink, appearing to read 'Joseph R. Cerchiaro'.

Joseph R. Cerchiaro
Regulatory Affairs Manager

Enc.

JRC:eoh

Copy: Mr. Richard Baker



Certificate of Insurance

ACORD

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

O'Gorman & Young, Inc.
159 Main Street
Chatham, N.J. 07928

COMPANIES AFFORDING COVERAGES

COMPANY LETTER **A** North River Insurance Co.

COMPANY LETTER **B**

NAME AND ADDRESS OF INSURED

Ames Rubber Corporation, Ames Avon
Industries & Ames Industries, Inc.
23-47 Ames Boulevard
Hamburg, New Jersey 07419

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)		
					EACH OCCURRENCE	AGGREGATE
	GENERAL LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> PREMISES—OPERATIONS <input type="checkbox"/> EXPLOSION AND COLLAPSE HAZARD <input type="checkbox"/> UNDERGROUND HAZARD <input type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS HAZARD <input type="checkbox"/> CONTRACTUAL INSURANCE <input type="checkbox"/> BROAD FORM PROPERTY DAMAGE <input type="checkbox"/> INDEPENDENT CONTRACTORS <input type="checkbox"/> PERSONAL INJURY			BODILY INJURY \$	\$	\$
				PROPERTY DAMAGE \$	\$	\$
				BODILY INJURY AND PROPERTY DAMAGE COMBINED \$	\$	\$
				PERSONAL INJURY		\$
	AUTOMOBILE LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> OWNED <input type="checkbox"/> HIRED <input type="checkbox"/> NON-OWNED			BODILY INJURY (EACH PERSON) \$	\$	
				BODILY INJURY (EACH ACCIDENT) \$	\$	
				PROPERTY DAMAGE	\$	
				BODILY INJURY AND PROPERTY DAMAGE COMBINED \$	\$	
A	EXCESS LIABILITY <input checked="" type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM	523 231484 4	5/1/84	BODILY INJURY AND PROPERTY DAMAGE COMBINED \$ 3,000	\$ 3,000	\$ 3,000
	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY			STATUTORY	\$	(EACH ACCIDENT)
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

See Attached

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 60 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER:

Mr. Joseph Czinar
EPA Region II, Grant Administration
Branch, Room 937-A
26 Federal Plaza
New York, New York 10278

DATE ISSUED: August 24, 1983

Henry J. Cluband
AUTHORIZED REPRESENTATIVE

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1) AETNA LIFE AND CASUALTY OF 1020 31ST STREET, DOWNERS GROVE, ILLINOIS 60515 HEREBY CERTIFIES THAT IT HAS ISSUED LIABILITY INSURANCE COVERING BODILY INJURY AND PROPERTY DAMAGE TO AMES RUBBER CORPORATION, AMES AVON INDUSTRIES AND AMES INDUSTRIES, INC. OF 23-47 AMES BOULEVARD, HAMBURG, NEW JERSEY 07419 IN CONNECTION WITH THE INSUREDS OBLIGATION TO DEMONSTRATE FINANCIAL RESPONSIBILITY UNDER 40 CFR 264.147 OR 265.147. THE COVERAGE APPLIES AT: NJD 002389468 HAMBURG, HAMBURG, NEW JERSEY
NJD 000818518 WANTAGE, WANTAGE TWP. NEW JERSEY
FOR SUDDEN ACCIDENTAL OCCURRENCES. THE LIMITS OF LIABILITY ARE: 1,000,000/1,000,000 BI AND 100,000/100,000 PD EXCLUSIVE OF LEGAL DEFENSE COSTS. THE COVERAGE IS PROVIDED UNDER POLICY NUMBER 08 GL 95457 CCA (08 GL 95336 CCA) ISSUED ON 4/13/83. THE EFFECTIVE DATE OF SAID POLICY IS 5/1/83.

2) THE INSURER FURTHER CERTIFIES THE FOLLOWING WITH RESPECT TO THE INSURANCE DESCRIBED IN PARAGRAPH 1:

- A) BANKRUPTCY OR INSOLVENCY OF THE INSURED SHALL NOT RELIEVE THE INSURER OF ITS OBLIGATIONS UNDER THE POLICY.
- B) THE INSURER IS LIABLE FOR THE PAYMENT OF AMOUNTS WITHIN ANY DEDUCTIBLE APPLICABLE TO THE POLICY, WITH A RIGHT OF REIMBURSEMENT BY THE INSURED FOR ANY SUCH PAYMENT MADE BY THE INSURER. THIS PROVISION DOES NOT APPLY WITH RESPECT TO THAT AMOUNT OF ANY DEDUCTIBLE FOR WHICH COVERAGE IS DEMONSTRATED AS SPECIFIED IN 40 CFR 264.147(F) OR 265.147(F).
- C) WHENEVER REQUESTED BY A REGIONAL ADMINISTRATOR OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA), THE INSURER AGREES TO FURNISH TO THE REGIONAL ADMINISTRATOR A SIGNED DUPLICATE ORIGINAL OF THE POLICY AND ALL ENDORSEMENTS.
- D) CANCELLATION OF THE INSURANCE, WHETHER BY THE INSURER OR THE INSURED, WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF SIXTY(60) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.
- E) ANY OTHER TERMINATION OF THE INSURANCE WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF THIRTY (30) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.

I HEREBY CERTIFY THAT THE WORDING OF THIS INSTRUMENT IS IDENTICAL TO THE WORDING SPECIFIED IN 40 CFR 264.151(J) AS SUCH REGULATION WAS CONSTITUTED ON THE DATE FIRST ABOVE WRITTEN, AND THAT THE INSURER IS LICENSED TO TRANSACT THE BUSINESS OF INSURANCE, OR ELIGIBLE TO PROVIDE INSURANCE AS AN EXCESS OR SURPLUS LINES INSURER, IN ONE OR MORE STATES.

Certificate of Insurance

acord

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

Dewey Insurance Agency, Inc.
P. O. Box 339
La Grange, IL 60525

COMPANIES AFFORDING COVERAGES

COMPANY LETTER **A** THE AETNA CASUALTY & SURETY CO.

COMPANY LETTER **B**

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

NAME AND ADDRESS OF INSURED

Ames Rubber Corporation
Ames Avon Industries And
Ames Industries, Inc.
23-47 Ames Boulevard
Hamburg, NJ 07419

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)		
					EACH OCCURRENCE	AGGREGATE
	GENERAL LIABILITY	08 GL 95457 CCA	5-1-84	BODILY INJURY	\$ 1,000	\$ 1,000
<input checked="" type="checkbox"/>	COMPREHENSIVE FORM			PROPERTY DAMAGE	\$ 100	\$ 100
<input checked="" type="checkbox"/>	PREMISES—OPERATIONS					
<input type="checkbox"/>	EXPLOSION AND COLLAPSE HAZARD					
<input type="checkbox"/>	UNDERGROUND HAZARD					
<input type="checkbox"/>	PRODUCTS/COMPLETED OPERATIONS HAZARD			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
<input type="checkbox"/>	CONTRACTUAL INSURANCE			PERSONAL INJURY		\$
<input type="checkbox"/>	BROAD FORM PROPERTY DAMAGE					
<input type="checkbox"/>	INDEPENDENT CONTRACTORS					
<input type="checkbox"/>	PERSONAL INJURY					
	AUTOMOBILE LIABILITY			BODILY INJURY (EACH PERSON)	\$	
<input type="checkbox"/>	COMPREHENSIVE FORM			BODILY INJURY (EACH ACCIDENT)	\$	
<input type="checkbox"/>	OWNED			PROPERTY DAMAGE	\$	
<input type="checkbox"/>	HIRED			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	
<input type="checkbox"/>	NON-OWNED					
	EXCESS LIABILITY			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
<input type="checkbox"/>	UMBRELLA FORM					
<input type="checkbox"/>	OTHER THAN UMBRELLA FORM					
	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY			STATUTORY		
	OTHER				\$	(EACH ACCIDENT)

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

SEE ATTACHED

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 60 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER:

Mr. Joseph Czinar
EPA Region II, Grant Administration Branch
Room 937-A
26 Federal Plaza
New York, New York 10278

DATE ISSUED

July 1, 1983

AUTHORIZED REPRESENTATIVE

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

- 1) AETNA LIFE AND CASUALTY OF 1020 31ST STREET, DOWNERS GROVE, ILLINOIS 60515 HEREBY CERTIFIES THAT IT HAS ISSUED LIABILITY INSURANCE COVERING BODILY INJURY AND PROPERTY DAMAGE TO AMES RUBBER CORPORATION, AMES AVON INDUSTRIES AND AMES INDUSTRIES, INC. OF 23-47 AMES BOULEVARD, HAMBURG, NEW JERSEY 07419 IN CONNECTION WITH THE INSURED'S OBLIGATION TO DEMONSTRATE FINANCIAL RESPONSIBILITY UNDER 40 CFR 264.147 OR 265.147. THE COVERAGE APPLIES AT: NJD 002389468 HAMBURG, HAMBURG, NEW JERSEY
NJD 000818518 WANTAGE, WANTAGE TWP. NEW JERSEY
FOR SUDDEN ACCIDENTAL OCCURRENCES. THE LIMITS OF LIABILITY ARE: 1,000,000/1,000,000 BI AND 100,000/100,000 PD EXCLUSIVE OF LEGAL DEFENSE COSTS. THE COVERAGE IS PROVIDED UNDER POLICY NUMBER 08 GL 95457 CCA (08 GL 95336 CCA) ISSUED ON 4/13/83. THE EFFECTIVE DATE OF SAID POLICY IS 5/1/83.
- 2) THE INSURER FURTHER CERTIFIES THE FOLLOWING WITH RESPECT TO THE INSURANCE DESCRIBED IN PARAGRAPH 1:
- A) BANKRUPTCY OR INSOLVENCY OF THE INSURED SHALL NOT RELIEVE THE INSURER OF ITS OBLIGATIONS UNDER THE POLICY.
 - B) THE INSURER IS LIABLE FOR THE PAYMENT OF AMOUNTS WITHIN ANY DEDUCTIBLE APPLICABLE TO THE POLICY, WITH A RIGHT OF REIMBURSEMENT BY THE INSURED FOR ANY SUCH PAYMENT MADE BY THE INSURER. THIS PROVISION DOES NOT APPLY WITH RESPECT TO THAT AMOUNT OF ANY DEDUCTIBLE FOR WHICH COVERAGE IS DEMONSTRATED AS SPECIFIED IN 40 CFR 264.147(F) OR 265.147(F).
 - C) WHENEVER REQUESTED BY A REGIONAL ADMINISTRATOR OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA), THE INSURER AGREES TO FURNISH TO THE REGIONAL ADMINISTRATOR A SIGNED DUPLICATE ORIGINAL OF THE POLICY AND ALL ENDORSEMENTS.
 - D) CANCELLATION OF THE INSURANCE, WHETHER BY THE INSURER OR THE INSURED, WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF SIXTY(60) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.
 - E) ANY OTHER TERMINATION OF THE INSURANCE WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF THIRTY (30) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.

I HEREBY CERTIFY THAT THE WORDING OF THIS INSTRUMENT IS IDENTICAL TO THE WORDING SPECIFIED IN 40 CFR 264.151(J) AS SUCH REGULATION WAS CONSTITUTED ON THE DATE FIRST ABOVE WRITTEN, AND THAT THE INSURER IS LICENSED TO TRANSACT THE BUSINESS OF INSURANCE, OR ELIGIBLE TO PROVIDE INSURANCE AS AN EXCESS OR SURPLUS LINES INSURER, IN ONE OR MORE STATES.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 26 1983

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

MAY 26 1983

Mr. George Tyler
Assistant Commissioner for
Environmental Management and Control
New Jersey Department of
Environmental Protection
Labor and Industry Building, Room 805
P.O. Box CN 402
Trenton, New Jersey 08625

Dear Mr. Tyler:

On January 31, 1983, the Environmental Protection Agency (EPA) Region II sent 302 warning letters (sample copies enclosed) to owners and operators of hazardous waste facilities which were not in compliance with EPA's financial responsibility regulations. These regulations became effective in July 1982 and required facilities to demonstrate that funds are available for:

- ° meeting their obligations under the Resource Conservation and Recovery Act (RCRA) for proper closure and post-closure care of their facilities (i.e., "financial assurance"); and
- ° compensating others for bodily injury or property damage caused by accidents arising from operations of the facilities (i.e., "liability insurance").

The following is to summarize industry's compliance to date (or lack thereof) with the Federal financial responsibility regulations. See the enclosed computer printout for a listing of the facilities in compliance with the Federal regulations. Also enclosed is a listing of the facilities within each non-compliance category.

- ° Number of facilities which have submitted all required documents (including those facilities that have utilized the financial test and corporate guarantee methods of compliance) - 279
- ° Number of facilities which demonstrated financial assurance only - 10

- ° Number of facilities which demonstrated liability insurance only - 28
- ° Number of "non-submitters" (excluding facilities which either closed or requested to be declassified as hazardous waste facilities) - 56

The above numbers indicate that 94 facilities are in violation of the Federal and State financial responsibility requirements. Our concern is whether the State or EPA should proceed with enforcement follow-up activities for these 94 facilities. The State's financial regulations, which have been in effect since October 1981, are even more stringent than the Federal regulations in that they do not provide facilities with the option of using the corporate guarantee or the financial test for demonstrating proof of financial assurance and liability insurance. Two hundred and thirty facilities have utilized these alternative methods (see the enclosed computer printout for a listing of facilities which employed these methods). Now that New Jersey has received Phase I interim authorization, the State is responsible for enforcing financial regulations in lieu of EPA. However, the Phase I Memorandum of Agreement (MOA) does provide that EPA can initiate enforcement actions in cases where the State does not initiate timely and appropriate enforcement actions against violators. Regardless of which Agency takes the lead, enforcement actions must be based on the State's financial regulations (see enclosed EPA guidance on enforcement actions in authorized States).

Please notify me within the next two weeks as to the State's plan of action (including time frames) for conducting follow-up enforcement activities for the 94 facilities identified in the enclosure. (Of course, some of these facilities may have already provided the State with financial documentation pursuant to State regulations and would therefore not be considered enforcement candidates by New Jersey.) My staff and I are ready to provide assistance to New Jersey in implementing this high priority portion of the State's Phase I hazardous waste program. Alternatively, if the State chooses not to take the enforcement lead at this time, EPA is ready to proceed with initiating said enforcement actions and will keep New Jersey informed of its activities.

Your cooperation on this matter is appreciated.

Sincerely yours,



Conrad Simon
Director
Air & Waste Management Division

Enclosures

cc: Michael DeBonis
Asst. Director for Planning
and Resource Recovery, NJDEP (w/o encl.)

N.J. Facilities Which Submitted
No Financial Instruments
(total -- 56)

<u>EPA I.D. No.</u>	<u>Name</u>	<u>City</u>
NJD000316778	Princeton Biomedix	West Windsor Township
NJD000540062	Jersey Smelting & Refining	Jersey City
NJD000632240	Cylinder Maintenance Corp.	Kearny
NJD000692350	PNC Inc.	Mutley
NJD000692467	Interchemical Petroleum Corp- Eastern Inc.	Little Ferry
NJD000694307	Quanta Resources Corporation	Edgewater
NJD000765123	Polarone Manufacturing Co., Inc.	Newark
NJD000818518	Ames Rubber Corp. Vantage Plant	Wantage
NJD001394089	Synkote Paint Company	Elmwood Park
NJD001915800	James J. Keating Inc.	Perth Amboy
NJD002008118	H & S Chemical Company Inc.	Wallington
NJD002141711	John L. Armitage & Co.	Newark
NJD002141950	CP Chemicals Inc.	Sewaren
NJD002147643	Precision Resistor Co., Inc.	Hillside
NJD002160471	Excel Products Co., Inc.	New Brunswick
NJD002177640	C. D. I. Dispersions	Newark
NJD002193001	Johanson Manufacturing Corp.	Eocnton
NJD002200913	John B. Moore Corporation	South Amboy
NJD002327963	Materials Elec Pils Corp.	Trenton
NJD002344190	United States Bronze Powders	Flemington
NJD002349751	Struthers-Dunn, Inc.	Fitman
NJD002385664	Vineland Chemical	Vineland
<u>NJD002389468</u>	Ames Rubber Corp. Hamburg Plant	Hamburg

<u>EPA I.D. No.</u>	<u>Name</u>	<u>City</u>
NJD002457114	GMC New Departure Hyatt Bearings Clark	Clark
NJD002482545	Viking Yacht Company	New Gretna
NJD002561652	Amox Specialty Metals	Florham Park
NJD002561868	Drew University	Madison
NJD011728656	Keystone Metal Finishers, Inc.	Secaucus
NJD012888525	Middletown Leather Co., Inc.	Hackettstown
NJD044081222	Hummel Chemical Company	South Plainfield
NJD044638935	Arsynco, Inc.	Carlstadt
NJD046351268	Sandvik, Inc.	Fair Lawn
NJD049544438	Diamond Aerosol Corporation	Glen Gardner
NJD061347860	Coult Inc. Industrial Battery Div.	Saddle Brook
NJD067362087	Lilly Industrial Coatings, Inc.	Paulsboro
NJD067484923	H L Beth Ltd.	Perth Amboy
NJD068292648	Standard Tank Cleaning Corp.	Bayonne
NJD076056234	BEH Chemical Services, Inc.	Pedricktown
NJD077091569	Associated Packaging, Inc.	Hurffville
NJD077549772	General Marine Transport Corp.	Bayonne
NJD080602568	Food Building & Construction Co. Inc.	Kearny
NJD081394741	Valmet Processing Corp. of N.J.	Sayreville
NJD087280038	Ideal Plating & Polishing Co., Inc.	Belleville
NJD093846301	Custom Chemicals Company	Elmwood Park
NJD093495033	Presto, Incorporated	Newark
NJD096875438	Cress Chemical Company	Newark
NJD093102794	San Juan International	Trenton

<u>EPA I.D. No.</u>	<u>Name</u>	<u>City</u>
NJD930525693	IT Corporation	Edison
NJD980526867	Shielding Technology	Piscataway
NJD980535959	Marko Engraving & Art Corp.	Fairview
NJD980594022	E.L. Beth Ltd.	Edison
NJD980642888	Kelbro, Inc.	Camden
NJD991304148	Viking Terminal Company	Sayreville
NJT000028134	Barone Barrel & Drum Company	Paterson
NJT350011144	Exxon Bayonne Plant	Bayonne
NJT350014585	Campbell Foundry Company	Kearny

N.J. Facilities Which Submitted
Liability Insurance Only
(total - 28)

<u>EPA I.D. No.</u>	<u>Name</u>	<u>City</u>
NJD000304732	Becton Dickinson & Company	E. Rutherford
NJD000310417	Grow Group Inc.-Dewoe Marine Coatings Co.	Pennsauken
NJD000313477	NAPPI Trucking Corp.	Old Bridge Township
NJD000811461	Princeton Circuit Boards, Inc.	Trenton
NJDC01392670	Hennette Div. Mundet Industries Inc.	Carlstadt
NJDC01399013	Credite Chemical Coatings Inc.	Irvington
NJDC02137313	Rosson Metals Corporation	Newark
NJ0002139145	Flint Ink Corporation	Lodi
NJDC02151322	Fairmount Chemical Co., Inc.	Newark
NJDC02153067	Fritzsche Dodge & Olcott Inc.	Clifton
NJDC02155443	Cessna Aircraft	Boonton
NJDC02395382	Ingersoll-Rand Company	Phillipsburg
NJDC02458342	Sun Chemical Corporation Pigments Div.	Newark
NJDC02491116	Deptford Plating Company	Deptford
NJDC11394467	Standard T Chemical Co., Inc.	Linden
NJDC042793076	Matheson Division Seattle Medical Prods.	East Rutherford
NJDC042797571	Hackensack Medical Center	Hackensack
NJDC044081354	Mellor Chemicals, Inc.	Avenel
NJDC046556486	Kinsley's Landfill, Inc.	Deptford
NJL047354832	Accurate Forming Corp.	Hamburg
NJL049143563	Bick Paint Manufacturers, Inc.	Jersey City
NJ0019360336	Fir-Bro Inc.	Edison
NJ0064981989	B & L Corporation	Newark
NJDC079304733	Clay Adams Div. of Becton Dickinson & Co.	Parsippany
NJDC080796732	Congoleum Resilient Flooring Div.	Trenton
NJDC096873500	Co-Operative Industries	Chester
NJ0990753493	Vanguard Research Assoc., Inc.	South Plainfield
NJLC67507368	Westwood Lighting Group, Inc.	Paterson

N.J. Facilities Which Submitted
Financial Assurance Only
(Total - 10)

<u>EPA I.D. No.</u>	<u>Name</u>	<u>City</u>
NJD000314674	Onyx Division Millmaster Onyx Group	Jersey City
NJD000314682	Lyndal Chemical Division	Lyndhurst
NJD001660786	Datascope Corp.	Oakland
NJD002165371	Inmont Corp. Hawthorne Plant	Hawthorne
NJD002442549	Curtis-Wright	Fairfield
NJD002444958	Inmont Corporation	Middlesex
NJD065815771	Alcan Ingot & Powders	Union
NJD094951258	A. Gross & Company	Newark
NJD095171930	Colonial Printing Ink Company	East Rutherford
NJD095171948	United States Printing Ink	East Rutherford



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

LINO F. PEREIRA, P.E.
DEPUTY DIRECTOR

20 JAN 1984

Mr. John R. Cerchiaro
Regulatory Affairs Specialist
Ames Rubber Corporation
Ames Boulevard
Hamburg, New Jersey 07419

RE: 1) 6/5/83 NJD002389468 Hamburg Classification Amendment
2) ✓ NJD000818518 Wantage Classification

Dear Mr. Cerchiaro:

On May 6, 1983, the Bureau of Hazardous Waste Engineering (the Bureau) classified Ames' Hamburg facility - NJD002389468 - as a TSD facility. The basis of this determination was that solid hazardous waste compaction, per Ames' December 7, 1982 submittal, was considered a treatment process under N.J.A.C. 7:26-1.4.

Upon review of the November 18, 1983 submittal which clearly outlines Ames' solid hazardous waste compaction process, the Bureau concludes that this process is not a volume reduction nor a reduction in hazardous waste mass, but actually a hazardous waste space reduction. Therefore, this process cannot be classified as hazardous waste treatment according to N.J.A.C. 7:26-1.4 and is exempt from hazardous waste regulation pursuant to N.J.A.C. 7:26-1 et seq.

Ames, Wantage, NJD000818518, filed with the USEPA as a hazardous waste TSD facility with drummed/containerized hazardous waste activity (S01) for 8,250 gallons.

Based upon Ames' most recent aforementioned submittal, the Bureau has reached the following understanding regarding Part A Permit Application activity for Ames - Wantage:

- (1) The S01 process code listed was filed to reflect the accumulation of on-site generated hazardous waste in containers/drums for a period of ninety (90) days or less.
- (2) Solid hazardous waste generated on-site is compacted in drums/containers for the purpose of space reduction.

If this understanding is incorrect, please notify this Bureau immediately.

20 JAN 1984

Assuming this understanding is correct, the Bureau concludes that Ames Rubber Corporation's hazardous waste TSD facilities as delineated by RCRA Part A permit applications and identified by the following EPA ID Numbers:

NJD002389468 Hamburg
NJD000818518 Wantage

have been excluded from hazardous waste TSD regulation under N.J.A.C. 7:26-1 et seq. because Ames:

- (1) Hamburg and Wantage facilities separately compact on-site generated solid hazardous waste which is not covered under hazardous waste management regulation according to N.J.A.C. 7:26-1 et seq.
- (2) Hamburg and Wantage facilities accumulate separately on-site generated hazardous waste in drums/containers for ninety (90) days or less which is exempt under N.J.A.C. 7:26-9.3.
- (3) Hamburg facility removed and decommissioned the 1,000 gallon underground waste oil tank which was not under hazardous waste management regulation according to N.J.A.C. 7:26-12.1(b)5.
- (4) Hamburg facility performs tank elementary neutralization which is subsequently discharged to the Walkill River. This activity is regulated under the scope of the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1.1 et seq., New Jersey Pollution Discharge Elimination System Regulation N.J.A.C. 7:14A-1.1 et seq. because waste water produced from the neutralization unit is non-hazardous and subsequently discharged to the Walkill River. This activity is exempted from the TSD hazardous waste management regulations, N.J.A.C. 7:26-9 through 12.

Ames Hamburg and Wantage facilities accumulation of on-site generated hazardous waste in drums/containers must be in compliance with the following:

- (1) All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility as defined at N.J.A.C. 7:26-1.4.
- (2) The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
- (3) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

20 JAN 1984

- (4) The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

Accumulation of containerized/drummed hazardous waste for a period longer than 90 days would constitute hazardous waste TSD facility activity and would be subject to regulation under N.J.A.C. 7:26-1 et seq.

This written acknowledgement of the exclusion for Ames Hamburg and Wantage facilities from hazardous waste TSD facility regulation (N.J.A.C. 7:26-9.12) is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical conditions of the actual hazardous waste activities occurring at the sites mentioned above.

Ames' hazardous waste facilities above do not fall under the scope of hazardous waste TSD facility regulation pursuant to N.J.A.C. 7:26-1 et seq. and need not comply with the interim operating requirements according to N.J.A.C. 7:26-9.10 and 9.13 Financial Assurance for Facility Closure and Liability Requirements.

In response to the final note of Ames' November 18, 1983 letter, in order for a hazardous waste process to be classified as a "Totally Enclosed Treatment Facility (TETF)", the following must clearly exist:

- (1) Each unit must be completely contained on all sides.
- (2) Each unit must pose negligible potential for escape of constituents to the environment except through natural calamities or acts of sabotage or war.
- (3) Each unit must be connected directly by pipeline or similar totally enclosed device to an industrial production process which produces a product, by-product, intermediate, or a material which is used back in the process.

An exemption from hazardous waste regulation for on-site recycling has been proposed and is expected to be adopted as of January 17, 1984 by the Department. Your solvent recovery operation may be exempt under this new regulation, when the exemption becomes effective.

In order for Ames' on-site recycling process to be considered an TETF or exempt from Hazardous Waste Regulation, the Bureau would require technical information and detailed drawings of the recycle process and production process facilities connected to the recycle process. An engineering inspection by the NJDEP would also be required prior to review for a TETF classification or a Hazardous Waste Regulation exemption determination.

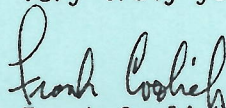
John R. Cerchiaro

-4-

20 JAN 1984

If you have any questions on this matter, please call Mr. William Sharples of my staff at (609) 984-4062.

Very truly yours,



Frank Coolick, Chief
Bureau of Hazardous Waste Engineering

EP6/jb

c: D. Shotwell
J. Golumbek
J. Barry
P. Kurisko



November 19, 1980

Environmental Protection Agency Region II
Information Service Center
26 Federal Plaza
New York, New York 10007

Dear Region II EPA Office:

Enclosed you will find completed Application Forms 1, General Information, and Application Forms 3, Hazardous Waste Information of the Environmental Protection Agency's Consolidated Permits Program, as prescribed by regulatory mandate for facilities which treat, store or dispose of hazardous waste.

Ames Rubber Corporation has attempted, as a responsible member of the industrial community and as a company cognizant of the needs and requirements for the safe handling and disposal of hazardous wastes, to understand and comply with the complex regulations set forth under the Resource Conservation and Recovery Act (RCRA).

It is important to point out that Ames Rubber Corporation, as a potential hazardous waste storage facility, does not intend to store any hazardous wastes in excess of the 90-day limitation. However, based upon a number of recent publications and other information, it appears that a situation could arise where our hazardous waste disposal facility would not meet our schedule or may, in fact, not accept our wastes any longer. As such, it would not be unlikely that Ames Rubber Corporation would be forced to store hazardous wastes in excess of 90 days. Therefore, we are submitting the enclosed information such that we can obtain interim status and continue operating in an appropriate compliance posture should the above situation occur.

Continued

In addition, a few major points should be stated regarding our desire to provide the EPA with appropriately accurate estimates of the types and quantities of hazardous wastes generated and stored at our facilities. It must be understood that the estimates submitted are our best "guestimates" of a collection of information heretofore never regulated in a manner now prescribed under RCRA. As a result, these estimates were based upon a number of informational sources such as plant histories, disposal receipts, recorded transactions, personnel interviews, bills of lading, manifests, and some monitoring activities which were not necessarily "official" record systems.

Also, with respect to some of the quantities listed, the estimate reflects the total waste, not necessarily the actual toxic contaminant present. For example, in our permit submissions, we have listed an estimated annual quantity for D008 (lead) as 17,000 pounds. However, disregarding the associated sludges, paper contaminated goods, and rubber wastes, the actual lead contained in this waste approaches 170 pounds per year under maximum production conditions.

Albeit, Ames Rubber Corporation has reviewed all relevant information and to the best of our present understanding, is confident that the information submitted in the enclosed permits is reasonable and realistic.

Respectfully submitted,

AMES RUBBER CORPORATION

Richard J. Majos
Richard J. Majos
Manager of Regulatory Affairs

RJM/bmc
encs.
CMRRR #719088

CC: R. M. Glidden
J. D. Marvil
A. E. Wright
L. C. Ryder
F. P. Lorenzoni
T. Case
J. R. Cerchiaro
file



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON
DIRECTOR

LINO F. PEREIRA
DEPUTY DIRECTOR

May 6, 1983

Joseph R. Cerchiaro
Regulatory Affairs Specialist
Ames Rubber Corporation
Ames Boulevard
Hamburg, New Jersey 07419

RE: Facility Classification and Permitting Requirements
Ames Rubber Corporation, EPA ID NO. NJD002389468

Dear Mr. Cerchiaro:

The Bureau of Hazardous Waste Engineering (the Bureau) acknowledges receipt of your letter dated December 7, 1982, in which you request withdrawal of RCRA interim status for the Hamburg facility NJD002389468 on the basis of the subject facility being a totally enclosed treatment facility and the accumulation of containerized hazardous waste for less than ninety (90) days.

Ames, Hamburg has filed with the USEPA as a generator and TSD facility with containerized/drummed hazardous waste activity (S01) at 5,500 gallons and hazardous waste tank storage activity (S02) at 1,275 gallons.

The Bureau's understanding of Ames' hazardous waste activity is as follows:

- (1) Containerized/drummed hazardous waste storage at the Hamburg facilities for 90 days or less.
- (2) Hazardous waste underground tank storage, which has been removed from the ground and decommissioned. This tank was the S02 process filed for in the original USEPA Part A application.
- (3) Operation of an Elementary Neutralization Unit discharging into a settling pond, which is part of the Walkill River.

Please notify this Bureau immediately if the above understanding is incorrect.

The Bureau concludes, based on the assumption that the above understanding is correct, that Ames is eligible for hazardous waste activity S01 delisting provided the following are complied with:

Log as DEP referral
- resolve
Referral
- Delete TSD
- also used
Commitment
to indicate
that S02
is gone.
JH
mmh
6/16/83

*105 d
64 DE
Joel Tolumbeck
Tom - revise
data base
file

Mr. Joseph R. Cerchiaro
RE: Ames Rubber Corporation
EPA ID NO. NJD002389468
Page 2

May 6, 1983

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

Ames, Hamburg is also eligible for delisting of Hazardous Waste Tank Storage activity (S02) since the underground tank has been removed and decommissioned.

The regulation of tank elementary neutralization is excluded from RCRA but is not excluded from the NJDEP hazardous waste management regulations. The tank neutralization process and subsequent discharge to the Walkill River would be regulated by the Industrial Treatment Works Section of the Division of Water Resources. I have forwarded your delisting request regarding this process to this section and I am presently awaiting their determination. Upon receipt of this determination, this Bureau will notify Ames whether or not this process is eligible for delisting.

*delete
Ton - go
RCRA
regulated
activity
data base*

In response to the question in Ames' February 28, 1983 correspondence regarding solid hazardous waste compaction, this is considered to be a volume reduction which classifies as a hazardous waste treatment, pursuant to N.J.A.C. 7:26-1.4 by definition, therefore this process is not exempt from the hazardous waste regulations, regarding treatment facilities.

If you have any further questions, please contact Mr. Bill Sharples of my staff at (609) 633-7713.

Very truly yours,

Frank Coolick

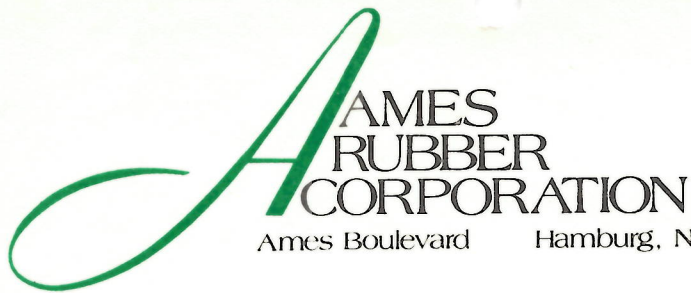
Frank Coolick, Chief
Bureau of Hazardous Waste Engineering

FC:WS:jb

cc Dave Shotwell
NJDEP, Division of Waste Management

Joel Golumbek
USEPA, Region II

Ken Goldstein
NJDEP, Division of Water Resources



CC TO FILE ~~June 8~~

~~Joel~~
FBI

201 827-9101

TWX 710-988-3241

July 13, 1982

NJ29002 389 468

Region II Administrator
Solid Waste Branch
26 Federal Plaza
New York, New York 10007

Dear Sir:

On July 6, 1982, at approximately 9:15 a.m., I reported a spill of approximately 120 gallons of #6 Fuel Oil to the National Response Center and to the D.E.P. of New Jersey. Our in-house spill response team attended to the clean up. The incident occurred when a fuel line from the fuel storage tank to the boiler room sprung a leak. The fuel oil then entered our drainage system and traveled out to our settling pond where it was contained by absorbent booms and pads. We then proceeded to vacuum up the spill.

The clean up time consisted of five days. There were 10 drums of #6 Fuel Oil and water mixture generated from the clean up. There were also 3 drums of pads, booms, rags and soiled clothing. The liquid drums will be pumped out by Loeffel's Waste Oil Service of West Milford, New Jersey, who will then take it to B&L Oil Corporation in Newark, New Jersey. The solid drums of rags, pads, booms and clothing will go to AETC in Mount Olive, New Jersey during our next pickup.

The spill was caused by a break in the fuel line which will be replaced by a stainless steel line during our shutdown period, July 19-31, 1982. This measure should prevent any recurrence of this type.

There were no injuries or hazards to human health or the environment. I received a call from Mr. George Zachos of the U.S. EPA in Edison, New Jersey and apprised him of the entire situation. He seemed assured that we were handling the situation properly.

If I can be of further assistance, or if more information is needed, please don't hesitate to call upon me.

Very truly yours,

Joseph R. Cerchiaro

Joseph R. Cerchiaro
Regulatory Affairs Specialist

Atts. (2)
JRC:eoh

Copy: Arnold Wright (Facility Emergency Coordinator)

PAG
JUL 23 11:33 PM '82
NEW YORK, NY 10007

AMES SUPERFUND
REPORT OF SPILLAGE FORM

National Response Center: 800-424-8802 or 202-426-2675

Person Contacted: Petty Officer Blackwell

Date & Time of Call: 7/6/82 9:45 a.m.

Date of Spill: 7/6/82

Type of Hazardous Substance Spilled: #6 Fuel Oil

Amount of Spill: Approximately 120 Gallons

SPILL AREA: (Check One)

XX by a drain
_____ on the land surface
_____ in the parking lot
_____ by a waterway
_____ by a roadway

SPILLED FROM: (Check One)

_____ drum
_____ vehicle
XX tank - fuel lines
_____ pouring can

Person Reporting the Spill: Joseph R. Cerchiaro

Reason for the Spill: Leak in the fuel lines that feed the boilers and it got into our drainage system and out to the settling pond.

Reason for NOT Reporting the Spill: N/A

Reason for Reporting the Spill: Exceeded the reportable quantity limit.

Signature & Date of Reporter: Joseph R. Cerchiaro 7/12/82

Signature & Date of the Director of Regulatory Affairs:
(V.P.)

Joseph R. Cerchiaro 7/15/82

PAP
JUL 23 12 44 PM '82
NEW YORK STATE
10007
SECTION

AMES SUPERFUND
REPORT OF SPILLAGE FORM

National Response Center: 800-424-8802 or 202-426-2675

Person Contacted: Fred Sickels Case #820706001

Date & Time of Call: 7/6/82 9:30 a.m.

Date of Spill: 7/6/82

Type of Hazardous Substance Spilled: #6 Fuel Oil

Amount of Spill: Approximately 120 Gallons

SPILL AREA: (Check One)

XX by a drain
_____ on the land surface
_____ in the parking lot
_____ by a waterway
_____ by a roadway

SPILLED FROM: (Check One)

_____ drum
_____ vehicle
XX tank - fuel lines
_____ pouring can

Person Reporting the Spill: Joseph R. Cerchiaro

Reason for the Spill: Leak in the fuel lines that feed the boilers and it got into our drainage system and out to the settling pond.

Reason for NOT Reporting the Spill: NA

Reason for Reporting the Spill: Exceeded the reportable quantity limit.

Signature & Date of Reporter: Joseph R. Cerchiaro 7/12/82

Signature & Date of the Director of Regulatory Affairs: Joseph R. Cerchiaro 7/15/82
(V.P.)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

9 5 FEB 1981

Subject: Hazardous Waste Permit Application-Missing Information
EPA ID No: **NJD 002389468**

The Region II office of the U.S. Environmental Protection Agency (EPA) has received an application for a Federal Hazardous Waste Permit for your facility. The Agency has conducted a preliminary review of the application enclosed and found that the information items marked below are missing. In order for the Agency to determine whether the owner or operator of the facility qualifies for interim status, these items should be completed and the application returned to the address below within 15 days of your receipt of this letter.

Information Service Center
U.S. Environmental Protection Agency
Region 2
26 Federal Plaza
New York, New York 10278

Failure to submit the necessary information within the required time-frame will jeopardize your eligibility for interim status. Until that time, however, the facility may continue to operate, provided there is compliance with all the applicable provisions of 40 CFR Part 265.

The Agency will perform a complete review of your application after it is resubmitted. If it is determined at that time that further information is needed, or that the facility does not qualify for interim status, you will be so notified.

THE FOLLOWING MISSING ITEMS MUST BE COMPLETED.

- ☐ Form 1 Missing in entirety
- ☐ Form 1 Item X111.B. Signature
- ☐ Form 3 Missing in entirety
- ☐ Form 3 Item II.A.1. Date Operation Began or Construction Commenced
- ☒ Form 3 Item IX.B. Owners Signature

Your cooperation in the EPA Hazardous Waste Management Program is appreciated.

Sincerely yours,

Richard A. Baker

Richard A. Baker
Chief
Permits Administration Branch
Planning and Management Division